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March 6, 2014

Via Electronic Comment Filing System

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 10-90 –Expression of Interest in Conducting Rural Broadband Experiment

Dear Ms. Dortch:

Enclosed for electronic filing via the Electronic Comment Filing System ("ECFS") in compliance with Federal Communications ("FCC") Order, FCC 14-5, is the attached non-binding Expression of Interest ("EOI") for Adams TelSystems, Inc. ("Adams") regarding the Connect America Phase II network experiments. Adams appreciates the opportunity to file the non-binding EOI.

If you have any questions or concerns on the attached EOI, please contact me.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'James W. Broemmer, Jr.', written over a horizontal line.

ADAMS TELSYSTEMS, INC.
James W. Broemmer, Jr.
Chief Executive Officer
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Attachments (Non-binding EOI)

Non-Binding Expression of Interest – Phase II Rural Broadband Experiment

Adams TelSystems, Inc., (“Adams”) submits this Expression of Interest (“EOI”) for Connect America Phase II Rural Broadband Experiments per Federal Communications Commission (“FCC”) Order, FCC 14-5. This is Stage 1 of the FCC’s Phase II experiment proposals and Adams anxiously awaits release of the Stage 2 formal proposal requirements.

Background

Adams has a proven success rate of deploying rural high-speed last mile broadband networks. We have been in the telecommunications industry for 19 years deploying high quality voice and broadband services, and our parent company, Adams Telephone Co-Operative, has operated since 1952 as an independent telephone company (“ILEC”). As a competitive local exchange company (“CLEC”), Adams plans to apply for Eligible Telecommunication Carrier (“ETC”) status if Adams is chosen to receive funding for the areas we are proposing to serve.

On this project, Adams will be working in conjunction with its sister company, Adams NetWorks, Inc., an Internet Service Provider (“ISP”). The two companies currently provide voice and/or high-speed broadband services in the Central Western Illinois counties of Adams, Brown, Hancock, McDonough, Pike, and Schuyler and the North Eastern Missouri counties of Lewis, Marion, and Ralls. These services are currently provided over fiber and copper facilities. The facilities are also provided over Unbundled Network Element (“UNE”) loops owned by other carriers, as well as facilities owned by Adams. Various wireless technologies (licensed, unlicensed and satellite) are also utilized in some areas, showing that Adams has experience in providing broadband service across all different types of technologies. As a CLEC, Adams does not currently receive Universal Service Funding; however, our ILEC affiliate company receives Universal Service Funding. Therefore, our company’s organization has extensive experience with Universal Service Funding reporting requirements.

Proposed Service Area

The proposed service area covers census tracts in Adams, Brown, Hancock, McDonough, Pike, and Schuyler counties in Central Western Illinois. Based on the Federal Communication Commissions (“FCC”) Public Notice, DA 14-154, report dated February 5, 2014 for price cap areas, the proposed project is estimated to provide broadband access to a total of 2,725 eligible high cost locations once completed, with 757 locations considered as extremely eligible high cost locations..

		Eligible	
		High	Extremely
State	County	Tract	High Cost
	Name	TractID	Number
			Locations
IL	17001 Adams	17001000400	4-00
			1
			0
IL	17001 Adams	17001000800	8-00
			3
			0
IL	17001 Adams	17001010100	101-00
			7
			1
IL	17001 Adams	17001010200	102-00
			11
			7
IL	17001 Adams	17001010300	103-00
			400
			95
IL	17001 Adams	17001010400	104-00
			85
			19
IL	17001 Adams	17001010500	105-00
			6
			2

IL	17001	Adams	17001010600	106-00	152	13
IL	17009	Brown	17009970400	9704-00	34	31
IL	17067	Hancock	17067953700	9537-00	48	12
IL	17067	Hancock	17067953900	9539-00	66	24
IL	17067	Hancock	17067954000	9540-00	454	35
IL	17067	Hancock	17067954200	9542-00	262	120
IL	17067	Hancock	17067954300	9543-00	396	83
IL	17109	McDonough	17109010100	101-00	58	14
IL	17109	McDonough	17109010200	102-00	1	0
IL	17109	McDonough	17109010300	103-00	14	1
IL	17109	McDonough	17109011000	110-00	18	0
IL	17149	Pike	17149952500	9525-00	106	57
IL	17149	Pike	17149952600	9526-00	356	139
IL	17149	Pike	17149952800	9528-00	145	64
IL	17169	Schuyler	17169970100	9701-00	7	7
IL	17169	Schuyler	17169970300	9703-00	95	33

Community Anchor Institutions

Adams is unable to determine the total number of Community Anchor Institutions (“CAIs”) located within the proposed project since the eligible unserved high cost census blocks within the selected census tracts have yet to be identified; however, Adams currently services many CAIs within its current serving area and, if funded, could offer scalable high-speed broadband to CAIs located within the proposed service area.

Broadband Technology

Adams anticipates using licensed 4G LTE fixed wireless technology for this proposed project area in order to build a high-speed, robust, scalable broadband network. This technology is chosen for the project as it provides a lower cost alternative than wired service making for a feasible alternative to deliver a robust and scalable offering to the premises in the unserved census blocks that the FCC has identified in the previously referenced counties. Out of our current 52 wireless sites, we currently have six 4G LTE wireless sights operating using our 700 licensed spectrum and have three more LTE sights in various stages of construction. The LTE technology enables us to continue to scale up our offerings as advances are made to the 4G technology currently in use. The backhaul from the tower sites would then be over fiber facilities or using microwave technologies, providing for a robust backhaul capability.

Service Offerings

The service offerings anticipated by Adams are voice service and high-speed broadband service. Initially, we propose providing service at 8 Mbps down and 3 Mbps up for a price of \$49.95, an offering that

more than meets the needs of workers working from their homes, students needing service for distance learning using the internet, gaming, and the needs of those wanting to use the latest technology found in the smart homes of today, including the ability to view Netflix and similar services without any problems. Adams estimates the project to be completed within 12 months of award date.

Other Government/Tribal Participation

This project is not anticipated to receive any other government/tribal participation or support.

Funding

The exact estimate for this project is dependent upon the total number of census blocks the FCC would award to Adams, but we currently estimate the request to come in for approximately \$1,700,000 if awarded all 23 proposed census tracts. In the next phase of this process we would anticipate to be able to provide firmer numbers once we know the number of locations involved and where they are located. We anticipate requesting one time support to cover the cost of the initial investment, with Adams covering all operating and future capital costs.

Conclusion

Adams is pleased to provide this nonbinding "Expression of Interest" in serving the proposed area which includes 23 census tracts within six rural Illinois counties. Currently providing high-speed broadband service to 6,600 customers and over 2,100 voice customers, we have the expertise needed to deliver and provide high quality services in the census tracts we have expressed interest in, meeting both the current and future needs of the proposed service area. The funding requested would enable us to bring this high quality service to the premises designated. We look forward to the second phase of this process and would like to thank thank you for taking this proposed project into consideration as the final rules and budget are set for the available experiments.